Responses to Steller Sea Lion Mitigation Committee Questions
Re: AEC Proposal # 22 – AI Pollock

Currently all CH in the Aleutian Islands is closed to pollock trawling. While the fishery has been open for the last two years, no vessels have been willing or able to harvest commercial quantities of pollock outside CH.

The objective of the proposal is to meet the intent of Section 803 of the Consolidated Appropriations Act of 2004 (which allocated pollock to the Aleut Corporation for purposes of economic development of Adak) by mirroring the CH restrictions applicable to trawl P. cod in the AI.

Proposal #22 and SSLMC "Objectives Questions"

1. Continue to avoid jeopardy and adverse modification.

- Is there additional fishing effort inside of SSL critical habitat?

Yes, there is currently no directed pollock fishery inside AI SSL CH, so any access to AI SSL CH is 'additional.'

- Does the proposal provide trade-offs that reduce the total negative effects to SSL?

Yes. The proposal provides for a greater degree of spatial dispersion of effort.

Absent winter hydro-acoustic surveys, the AI pollock TAC would be sub-divided in the sub-areas (541/542/543) pro-rata to the summer bottom trawl survey. Harvests outside CH would accrue against the sub-area AI pollock TACs. The AI pollock ABC would be divided into 9 regions of two degrees of latitude each.

The allowable harvest inside any one of the 9 regions CH would be capped at $1/9_{th}$ of 50% of the
ABC in the A and also the B seasons up to the aggregate sub-area seasonal TAC.

Aleut Enterprise Corporation would work with NMFS to develop protocols for conducting hydro-acoustic surveys prior to fishing inside CH. In any of the 9 regional 2-degree block in which AEC arranged to conduct such a survey, the harvest cap would be modified based on the results of the survey biomass estimate. The cap per survey region would be calculated as a percentage (20%) of the survey biomass. The aggregate of all harvests across regions, inside and outside CH, would still be subject to the TAC limits.

- Does the proposal open a substantial amount of critical habitat?

Yes.

The proposal only allows pollock fishing between 174 to 178 longitude inside that portion of CH that is not inside 3 miles from a haulout or 20 miles of a rookery. Given the bathymetry in the AI, only a very small percent of the open area of CH would actually be subject to any pollock

fishing. NMFS staff (Steve Lewis) could do a GIS analysis of the intersection of fishable depths, and SSL CH, which would probably show that a very small of AI SSL CH would effectively be open to pollock fishing.

- Does proposal indirectly provide protection to additional sites?

No.

- Does proposal indirectly affect nearby SSL sites?

There are SSL sites in the region.

- Does proposal affect important research site? (e.g. Chiswell)

No.

- Does proposal offer additional measures to control fishing rate or effort?

Yes, see the discussion of spatial dispersion of effort above. Also, the Aleut Corporation has control of the number of vessels that would be allowed to fish at any time, so there are effort controls in the fishery.

A set of alternative mitigation measures were proposed to the SSLMC in 2004. These involved only opening two small areas, one in Kanaga Sound and the other near Atka Island. These two proposed open areas appear to represent less than 5% of AI SSL CH.

The 2004 proposal also suggested temporal catch limits within the open areas.

- Does the proposal reduce the no-fishing time between end of year (December) and first of year (January) fisheries at a critical time for SSL?

No change is proposed.

- Does the proposal affect the number of fishing days required to harvest the quota?

The AI pollock TAC is currently un-harvestable given the total closure of SSL CH. In one sense the time required to harvest the TAC under status quo is orders of magnitude greater than the duration of the fishing season. Thus allowing fishing that had the potential to actually harvest the TAC would reduce the number of days required. However, it would also increase the number of days actually fished.

2. Encourage development of a sound experimental design for monitoring.

Yes. AEC has been working cooperatively with AFSC to implement an experimental design and has all ready collaborated through the AICASS studies.

The concept behind AICASS was to incorporate cooperative research to conduct hydro-acoustic surveys before and after the fishing season. The data from the surveys could be utilized either in near real time, or on a one year lag basis, to set harvest limits as a fraction of

the survey biomass based on a cooperative agreement between the Aleut Corporation or its agency and the NMFS.

The cooperative research project is part of a broader scientific effort to collect improved genetic data on pollock stock structure. In 2009 the AICASS survey efforts will be coordinated with NMML monitoring of SSL diet in the area during the A season.

3. Minimize adverse social and economic impacts.

- Does the proposal provide economic benefits?

Yes.

The pollock fisheries in the BS and GOA management areas harvest virtually all of their TACs pf pollock and much of those harvests occur inside portions of SSL CH. Almost none of the AI pollock TAC allocated to the Aleut Corporation has been or will be harvested under federal regulations unless modifications are made to the total closure of SSL CH.

Any pollock harvested in CH fishery provides economic benefit that would otherwise be foregone.

If the full AI pollock TAC could be harvested, it would be a major increase to the economic benefits accruing to the participating harvesters, to the processing plant in Adak, and to the community of Adak.

The 2008 AI pollock ABC stands at 28,200 tons. That equates to nearly $10,000,000 of ex-vessel revenue to harvesters, or roughly $30,000,000 in 1st wholesale value. The raw fish tax revenue to the city of Adak on that amount of pollock would be about $300,000.

The concept of economic multipliers in a small coastal community like Adak is very tangible. The additional fishing activity could generate as much as $1,000,000 in fuel sales, which would provide more tax revenue to the city. More pollock harvested and delivered in Adak equates to more sales for local business (restaurants, grocery stores, expediters, etc.) as well as more local employment. The tax revenue would allow the city to employ people in essential services that are currently being foregone.

The economic impacts are more than incremental. It is a matter of maintaining a critical mass of economic activity for the city to even survive, and that critical mass is very much at risk under status quo.

- What is the impact upon harvesting and/or processing efficiency?

Harvesters with catcher vessels would have an opportunity to catch pollock where there are viable CPUE levels.

The processing plant would actually be able to utilize the investments in equipment that have been made in expectation of having access to the Aleut Corporation allocation mandated by Congress.

- Does the proposal have any effects on other fisheries?

It has the potential to benefit small boat fixed gear fishermen in other fisheries. To the extent that the processing plant is able to spread its capital cost over another fishery (pollock) then it is better able to keep the doors open to provide markets for the rest of the year for smaller, more marginal, fisheries.

- Will the proposed action be further affected by recent or pending council actions?

No.

4. Minimize bycatch of PSC and other groundfish.

- Does the proposal potentially create bycatch issues in other SSL prey species?
- Does the proposal potentially create bycatch issues in PSC species?

No bycatch impacts are likely to occur. (See 2007 EFP EA/Biop)

5. Promote safety at sea.

- Does the proposal reduce or increase safety for the fleet?

Fishing closer to shore is much safer for catcher vessels (particularly the <60' vessels that are required to harvest 50% of the AI pollock allocation after 2012) than it is for them to fish in the areas outside CH. The non-CH areas, 20 miles from SSL sites, are generally equivalent to being 20 miles from any shelter.

6. Minimize adverse impacts to threatened and endangered species in the BSAI and GOA

A pollock fishery in the AI is unlikely to impact any other endangered species. (See 2007 EFP EA/Biop)